



5 Things to Know About CMS' Notice of Benefit and Payment Parameters for 2027 Proposed Rule

[CMS Press Release](#) / [CMS Fact Sheet](#) / [Text of Proposed Rule](#)

1 **CMS proposes to change plan and benefit design rules** for plans offered on Affordable Care Act (ACA) Exchanges, including allowing insurers to offer more nonstandardized plan options, permitting non-network plans to attain the “Qualified Health Plan” certification by demonstrating adequate provider access, increasing consumer access to catastrophic coverage plans, and enabling insurers to offer catastrophic coverage plans with a term of up to ten consecutive years.

2 **The proposal includes tighter restrictions on marketing practices**, prohibiting brokers, agents, and plans offering monetary incentives for enrollment, falsely asserting enrollees may qualify for no-cost coverage, and “miscommunicating” enrollment timeframes. CMS also wants to require brokers and agents to use a standardized enrollee eligibility form. CMS says these changes will “protect consumers from bad actors.”

3 **CMS wants to increase ACA premium subsidy oversight** and limit eligibility for certain noncitizens, aligned with language in the One Big Beautiful Bill Act. CMS also proposes policies for Special Enrollment Periods and for income verification similar to those stayed in the [2025 Marketplace Integrity and Affordability Final Rule](#).

4 **The proposed rule would make it easier for states to establish their own Exchanges** by removing certain transitional requirements and allowing states to adopt a “private-sector approach” to their Exchanges.

5 **The Trump Administration’s messaging on affordability** carries through the proposed rule. Changes to allowable plan design, CMS says, will expand choice and affordability. CMS highlighted two **changes to Essential Health Benefits (EHBs)** rules intended to lower premiums: require states to defray the cost of EHBs provided beyond federal requirements, and prohibit the provision of adult dental benefits as an EHB.